REMARKS

The present application was filed on September 8, 2003 with claims 1-17. Claim 18 was added in an amendment dated April 11, 2006. Claims 1-18 remain pending. Claims 1, 14 and 18 are the independent claims.

The present application claims priority to United Kingdom and European applications filed December 24, 2002 and March 31, 2003, respectively.

Claims 1-18 stand rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 7,085,758 (hereinafter "Barsness").

In this response, Applicants traverse the §102(e) rejection and respectfully request reconsideration of the present application.

Applicants initially note that the Manual of Patent Examining Procedure (MPEP) §2131 specifies that a given claim is anticipated "only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference," citing Verdegaal Bros. v. Union Oil Co. of California, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). Moreover, MPEP §2131 further indicates that the cited reference must show the "identical invention . . . in as complete detail as is contained in the . . . claim," citing Richardson v. Suzuki Motor Co., 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). Applicants respectfully submit that the Examiner has failed to establish a prima facie case of anticipation of claims 1-18 by the Barsness reference.

Independent claim 1 is directed to a messaging system comprising a plurality of distributed front-end messaging systems and a centralized data store associated with the distributed front-end messaging systems. The distributed front-end messaging systems are remotely located from one another and from the centralized data store, and the centralized data store is adapted for communication with the distributed front-end messaging systems over a network. The centralized data store includes means for storing data associated with users of the distributed front-end messaging systems, and the distributed front-end messaging systems further include respective means for storing respective different portions of the centralized data, the respective different portions being associated with respective subsets of the users of the distributed front-end messaging systems, such that at least one messaging function can be

2

provided to a given one of the users of a given one of said distributed front-end messaging systems in dependence on the portion of the centralized data stored therein.

Illustrative embodiments of the claimed arrangement provide a number of significant advantages over conventional messaging systems. See the specification at, for example, page 6, lines 8-11.

In formulating the §102(e) rejection of claim 1, the Examiner argues that Barsness discloses a messaging system comprising <u>a plurality of distributed front-end messaging systems</u>, with the distributed front-end messaging systems being remotely located from one another, relying on element 214 in FIG. 2 of Barsness, and the text in column 6, lines 4-17. See the Office Action at page 2, section 2. Applicants respectfully disagree with this characterization of Barsness. Element 214 in FIG. 2 of Barsness is described therein as being <u>a single front-end messaging facility</u>. This single front-end messaging facility is part of a single front-end server 210, and clearly does not comprise a plurality of distributed front-end messaging systems which are remotely located from one another as recited in claim 1. The Barsness reference appears to refer only to a single front-end server and associated front-end messaging facility throughout its specification and claims.

Moreover, Applicants note that other limitations of claim 1 are not met by Barsness. For example, as indicated above, the distributed front-end messaging systems of claim 1 are further specified as including respective means for storing respective different portions of the centralized data, the respective different portions being associated with respective subsets of the users of the distributed front-end messaging systems, such that at least one messaging function can be provided to a given one of the users of a given one of said distributed front-end messaging systems in dependence on the portion of the centralized data stored therein. There is no teaching or suggestion in Barsness to the effect that different front-end messaging systems store respective different portions of centralized data associated with a centralized data store. Instead, Barsness appears to disclose nothing more than a one-to-one association between a single front-end messaging facility 214 and a single back-end database 230. See Barsness at, for example, column 5, lines 47-60, column 6, lines 4-11, and column 10, lines 7-12.
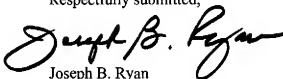
Accordingly, it is respectfully submitted that Barsness fails to meet each and every limitation of claim 1, and the rejection is traversed.

3

Independent claims 14 and 18 include limitations similar to those of claim 1, and are believed allowable for substantially the reasons identified above in the context of claim 1.

Dependent claims 2-13 and 15-17 are believed allowable for at least the reasons identified above with regard to their respective independent claims.

In view of the above, Applicants believe that claims 1-18 are in condition for allowance, and respectfully request the withdrawal of the §102(e) rejection.

Respectfully submitted,

Date: February 28, 2007

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